

JS 44 (Rev. 05/17)

TON**CIVIL COVER SHEET**

17-CV-2713

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Graphic Styles/Styles International LLC

(b) County of Residence of First Listed Plaintiff **Bucks, PA**
(EXCEPT IN U.S. PLAINTIFF CASES)(c) Attorneys (Firm Name, Address, and Telephone Number)
LAW OFFICES, MICHAEL J. BROOKS, ESQUIRE
3724 East Brandon Way
Doylestown, Pennsylvania 18902 (215) 230-3761**DEFENDANTS****17 2713**
VINNIE'S INTERNATIONAL HONG KONG CUSTOM TAILORSCounty of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input checked="" type="checkbox"/> 3 |
| Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Foreign Nation | <input type="checkbox"/> 6 | <input checked="" type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (Specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

COPYRIGHT INFRINGEMENT - 17 U.S.C. § 501, ET SEQ.

Brief description of cause:

COPYRIGHT INFRINGEMENT**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.DEMAND \$
250,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE
06/15/2017

SIGNATURE OF ATTORNEY OF RECORD

/s/ Michael J Brooks

JUN 15 2017

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

TON

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 775 Second Street Pike, Suite 3R, Southampton, Pennsylvania 18966

17 2713

Address of Defendant: TST P.O. Box 90303 Kowloon, Hong Kong

Place of Accident, Incident or Transaction: Copyright infringement on internet

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases
(Please specify)

Copyright Infringement

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Michael J. Brooks,

counsel of record do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☒ Relief other than monetary damages is sought.

DATE: 07 JUNE 2017

Michael J. Brooks

Attorney-at-Law

74630

Attorney I.D.#

JUN 15 2017

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 07 JUNE 2017

Michael J. Brooks

Attorney-at-Law

74630

Attorney I.D.#

TC

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIACASE MANAGEMENT TRACK DESIGNATION FORM

Graphic Styles/Styles International LLC

CIVIL ACTION

v.

17 2713

VINNIE'S INTERNATIONAL HONG KONG
CUSTOM TAILORS

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ☒ ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

7 JUNE 2017

Michael J Brooks

Plaintiff

Date

Attorney-at-law

Attorney for

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(215) 230-3761

Attorney@Law-Brooks.com

Telephone

FAX Number

E-Mail Address

(Civ. 660) 10/02

JUN 15 2017

MEMBER PENNSYLVANIA
AND NEW JERSEY BARS

TON
MICHAEL J.
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Attorney @ Law

WEB SITE: LAW-BROOKS.COM
E-MAIL: ATTORNEY@LAW-BROOKS.COM

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17 2713

June 7, 2017

United States District Court
Eastern District of Pennsylvania
U.S. Courthouse
601 Market Street, Room 2609
Philadelphia, PA 19106-1797

RE: *Graphic Styles/ Styles International LLC v. Vinnie's
International Hong Kong Custom Tailor*

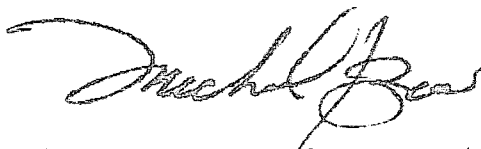
Dear Clerk, U.S. District Court:

Enclosed for filing please find:

1. Complaint;
2. Civil Cover Sheet;
3. Designation form;
4. Case Management Track Designation Form;
5. Disk containing PDF Documents; and
6. Filing fee.

Would you be so kind to file same, returning file stamped
copy of first page of Complaint and Summons.

Take good care,



Michael J. Brooks, Esquire

MJB/dab

#400
TON

In the United States District Court
for the Eastern District of Pennsylvania

GRAPHIC STYLES/
STYLES INTERNATIONAL LLC
775 Second Street Pike, Suite 3R,
Southampton, Pennsylvania 18966

Plaintiff,

v.

VINNIE'S INTERNATIONAL HONG KONG
CUSTOM TAILORS
TST P.O. Box 90303
Kowloon, Hong Kong

Defendant.

Civil Action No.

17 2713

COMPLAINT FOR
COPYRIGHT INFRINGEMENT

FILED

JUN 15 2017

By KATE BARKMAN, Clerk
Dep. Clerk
Civil Action

COMPLAINT FOR COPYRIGHT INFRINGEMENT

Plaintiff Graphic Styles/Styles International, LLC by and through its counsel, on personal knowledge of its member as to its own actions and on information and belief as to the actions, capabilities and motivation of others, hereby alleges as follows:

NATURE OF THE CASE

1. Graphic Styles/Styles International LLC, ("Graphic Styles") brings this action to recover damages, expenses, and attorney fees arising from the willful infringement by Defendants, of Plaintiff's registered copyrights on valuable artistic drawings and graphic representations of men's and women's fashion clothing styles, and to obtain injunctive relief against Defendants to cease and desist their infringement and to prevent them from any further unlawful copying and infringement of Plaintiff's copyrights.

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2. In violation of the Copyright Act, 17 U.S.C. § 501, et seq., Defendant reproduced and displayed on their website they established and controlled, at least 18 separate drawings of men's fashion clothing styles copied directly from copyrighted stylebooks, without any authorization or permission from Plaintiff -the owner of all right, title, and interest in all copyrights covering the drawings and stylebooks- despite express copyright restrictions and prohibitions against infringement and unauthorized use prominently stated in the stylebooks.

THE PARTIES

3. Graphic Styles is a limited liability corporation with its principal place of business located at 775 Second Street Pike, Suite 3R, Southampton, Pennsylvania 18966. Graphic Styles, owns all title, right, interest, ownership, and subsidiary and intellectual property rights in all the federally registered copyrights covering the drawings and graphic representations of men's fashion clothing styles that Defendant copied, displayed, and transmitted on Defendants' infringing website¹. Graphic Styles develops, produces, sells, and distributes stylebooks containing copyrighted drawings and graphic representations of men's and women's fashion clothing styles and licenses the use of copyrighted drawings and graphic representations of men's and women's fashion clothing styles for promotional

¹ Exhibits A and C.

proposes such as websites, brochures, catalogs, placards and other advertising media.

4. Defendant Vinnie's International Hong Kong Custom Tailors ("Vinnie's") is a business located in Kowloon, Hong Kong, is engaged in the business of selling custom tailored retail apparel for men and women, online at its website <www.vinnieshk.com>² and through fittings made on its business premises, and hotels and client's businesses by appointment throughout Philadelphia, throughout Pennsylvania and the United States.

JURISDICTION

5. This court has subject matter jurisdiction over Plaintiff's claims for unauthorized use and copyright infringement pursuant to 17 U.S.C. § 501.

VENUE

6. Venue lies in this court under 28 U.S.C. §§ 1391 and 1400 (a).

FACTS - THE COPYRIGHTED STYLEBOOKS

7. From about the 1950's until 2000, Graphic Fashions Inc., also known as Graphic Fashions International ("Graphic Fashions"), created, prepared, and published clothing stylebooks annually or semi-annually for use by tailors and

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² Exhibit B

manufacturers in the custom clothing industry ("preexisting material").

8. Each stylebook published by Graphic Fashions contained 160 to 260 artistic drawings and graphic representations of men's and women's fashion clothing styles: suits, jackets, trousers, vests, topcoats, tuxedos, pocket details, and measurements that Graphic Fashions had created.
9. Graphic Fashions also created several products (i.e., postcards, counter cards, flyers) including customized stylebook catalogs, wherein, the requesting custom clothing business would select images for their own in-house style guide.
10. Graphic Fashions was known throughout the custom clothing industry for the exceptional quality and value of the artistic drawings and graphic representations in its stylebooks. Its images of fashion styles are unique in the industry and were not distributed or available from any other source except Graphic Fashions or Plaintiff, who was its exclusive licensee and copyright assignee.
11. Graphic Fashions registered its stylebooks as compilations under the Copyright Act, 17 U.S.C. § 103, which protects all the images in the stylebook from infringement.
12. Graphic Fashions displayed in its stylebooks the copyright notice, "© Copyright, Graphic Fashions Inc. Phila., PA", on

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the left-hand margin of each page containing one or more clothing style drawing.

13. Richard C. Ackourey, Jr. (Ackourey) is a member of Graphic Styles and has been in the custom clothing business since 1984, initially in retail, then with several custom tailor companies, and finally starting his own business, Ackourey Clothiers Incorporated, in 1996.
14. Working for one of the largest custom clothier companies which had contracted with Graphic Fashions Incorporated ("Graphic Fashions") to design custom stylebooks for their outlets, Ackourey became familiar with Graphic Fashions' illustrations.
15. Ackourey utilized Graphic Fashions' stylebooks in his custom clothier business, in meeting face to face with clients.
16. Graphic Fashions eventually down-sized to publishing one stylebook a year, with its last stylebook being the 1999-2000 edition, thereafter, Ackourey met with the owner, John Garner (Garner).
17. At that time Garner was 86 years old and closing the business. Garner indicated no one is going to draw these works to his standards. Garner suggested no one was interested in pursuing the business, however, Ackourey believed it had potential, and expressed his interest in seeing the stylebooks continue.

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18. Ackourey contacted the Fashion Institute of America in New York, went to Moore College of Art and various other art schools to seek out artists capable of meeting Garner's standards. Garner would critique the illustrations Ackourey would bring to him, finding them unsatisfactory for a stylebook.
19. Therefore, Garner decided to license to Ackourey rights to Garner's illustrations. On March 15, 2003 Graphic Fashions granted Ackourey a license to reprint the images from the 1999-2000 Stylebook.
20. Through his efforts, Ackourey finally met Frank Grobelny, an artist who had previously done illustrations for Garner, and who is now working with Ackourey. Grobelny is currently sketching illustrations for Ackourey for the 2013 stylebook.
21. In the meantime, Garner offers that if Ackourey wants to do anything further with Graphic Fashions' illustrations, Ackourey would have to seek legal counsel and draft any necessary documents. On January 5, 2004, Graphic Fashions expressly grants Ackourey, the exclusive rights, for the life of the copyrights, to reproduce all copyrighted works owned by Graphic Fashions, and to create derivatives of, display, distribute, and transmit copies of, its copyrighted works. Graphic Fashions also assigns to

Ackourey all rights in derivative works created using the copyrighted works.

22. On July 3, 2007, Graphic Fashions expressly assigned to Plaintiff in writing "the entire title, right, interest, ownership and all subsidiary and intellectual property rights in and to" all copyrights registered to Graphic Fashions, "including but not limited to copyrights and the right to secure registered copyrights therein and to any resulting registrations in Assignee's name as claimant, and the right to secure renewals, and extensions of any such copyright or copyright registrations in the United States of America or foreign country as well as all choses [sic] in action relating to the [Graphic Fashion's copyrights], claims for damages, profits, and costs, both in equity and law, for any infringement of the [Graphic Fashion's copyrights]." A copy of the Copyright Assignment is attached as Exhibit A.

23. Using these drawings, and a few new illustrations, Ackourey published a 2005³ and 2006⁴ stylebook that each depicts a

³ In 2005 Plaintiff prepared, published, and distributed the Graphic Styles International Stylebook, Best of Seasons through Spring and Summer 2005 ("2005 Stylebook"), containing 220 images of drawings for men's and women's fashion clothing styles: suits, jackets, trousers, vests, topcoats, tuxedos, pocket details, and measurements, many of which were selected from the earlier preexisting material, i.e., stylebooks Graphic Fashions had published and registered as compilations under the Copyright Act. Plaintiff registered the 2005 Stylebook as a compilation under copyright registration number TX 6-956-665. The copyright protections in the preexisting material are

range of fashion clothing styles for men and women. Ackourey registered the 2005 and 2006 stylebooks as compilation copyrights on January 27, 2009 and January 30, 2009, respectively.

24. Plaintiff sells copies of the stylebooks to tailors and other tailored clothing businesses for their individual use in working face to face with customers. Prominent notices in the books prohibit any other use without express permission.

25. The first page of both the 2005 Stylebook and 2006 Stylebook prominently displayed the statement that:

The images found in the Styles International Stylebook may not be reproduced in any form or by any means - graphic, electronic, or mechanical, including photo copying or information storage and retrieval systems - without the expressed written consent and permission of the copyright holder.

26. The first page of the 2006 Stylebook also has a message from Plaintiff:

I encourage you to use this book to enhance your business, however, please do it legally Any unlawful use or violation of the copyright laws for

undisturbed and are herein independently enforced and damages independently pursued.

⁴ In 2006 Plaintiff prepared, published, and distributed the Graphic Styles International Stylebook, Best of Seasons 2006 ("2006 Stylebook"), containing 367 images of drawings for men's and women's clothing designs: suits, jackets, trousers, vests, topcoats, tuxedos, pocket details, and measurements, selected from earlier stylebooks Graphic Fashions had published and registered as compilations under the Copyright Act. Plaintiff registered the 2006 Stylebook as a compilation under copyright registration number TX 6-956-762. The copyright protections in the preexisting material are undisturbed and are herein independently enforced and damages independently pursued.

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these illustrations will be prosecuted to the fullest extent of the law.

27. The margin of the left-hand page in each stylebook also carried a copyright notice, "© Copyright, Graphic Fashions Inc. Phila., PA".
28. Although the infringed images appeared in Plaintiff's copyrighted stylebooks, the images are subject to re-use and redistribution in accordance with various licensing arrangements. Ackourey has licensed selected individual images for use in a promotional brochure by a clothing manufacturer. Plaintiff has established independent economic value for the images for licensing purposes.
29. Plaintiff sets fees at \$1,850.00 for an illustration and \$2,500.00 for a cover illustration for up to one year's use of single image. Renewal fees are set at \$600.00 for an illustration and \$825.00 per year for a cover illustration.
30. Southwick Clothing Corporation, contacted Ackourey to license drawings a Southwick representative had seen in the 2005 Style Book, at a tailor shop in Texas. The representative saw the book and called Ackourey to create a custom book. A custom book was crafted by Ackourey, utilizing 12 illustrations Southwick selected from the 2005 Stylebook. Approximately 350 units were sold to Southwick at approximately \$75 a unit. The custom book included the

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copyright disclaimer, "Copyright, Graphic Fashions, Inc. Phila., Pa." on each illustration and the inside contents page.

31. Additionally, another division of Southwick entered into a licensing agreement for four illustrations to produce 500 copies of a countertop brochure. Southwick paid six thousand dollars (\$6,000.00) for the licensing of the four illustrations.
32. On August 16, 2007 Ackourey formed Graphic Styles/Styles International LLC because of the stylebooks initial success in generating licensing agreements and the future potential.
33. Ackourey's initial success quickly tapered off, as violation of the copyrights proliferated. The Indo-Hong Kong Tailor Business one-upmanship plays itself out as competitors seek the same advantage infringing Plaintiff's copyrights. Graphic Styles/Styles International LLC carries a substantial portion of its value in intellectual property and herein seeks to enforce its copyrights.
34. Ackourey assigned the copyrights to Graphic Styles/Styles International. Ackourey's Graphic Styles/Styles International LLC carries a substantial portion of its value in intellectual property and herein seeks to enforce its copyrights.

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DEFENDANTS' INFRINGEMENT

35. By advertising on its website, Vinnie's recruits clients all over the world, including the United States, United Kingdom, Ireland, Australia and New Zealand. During these sales tours, Vinnie's associates book a swanky hotel suite, where they meet and take orders from new and old customers. The customers show up, choose from a selection of material, pick a fabric and design, have their measurement taken and make the payment. The suits are then sewn in Hong Kong to specifications and shipped to the customer in four to six weeks.
36. Defendants utilize the web site <www.vinnieshk.com>. Beginning in approximately 2014 and continuing to approximately the filing of this Complaint and beyond, Defendants displayed on their website images showing fashion styles that were copied from the Plaintiff's Stylebooks.
37. Defendant did not attribute the artistic drawings as belonging to Plaintiff, but passed off the artistic drawings as original to Defendant.
38. Defendant also placed unlawful copyright notices on webpages containing images copied from Plaintiff's copyrighted stylebooks.

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39. Defendants' specific purpose in creating and transmitting the infringing web pages, was to use Plaintiff's copyrighted drawings to attract and secure purchasers for the specific fashion clothing styles shown in the images. Defendants' use of the copyrighted drawings to solicit sales and promote the business and reputation of the Defendant was a use of the copyrighted works that neither Plaintiff nor Graphic Fashions had permitted Defendant to make.
40. Defendant knew that the drawings taken from Plaintiff's 1999-00, 2005 and 2006 copyrighted stylebooks were protected by copyright, that they could not lawfully copy them without express permission from the copyright owner, and that the Defendant had never obtained authorization from the owner of the images, to use, copy, display, and transmit the images they had copied and displayed on the aforementioned websites.

COUNT ONE

COPYRIGHT INFRINGEMENT - 17 U.S.C. § 501, ET SEQ.

41. Plaintiff incorporates the prior paragraphs by reference.
42. Plaintiff is the sole owner by recorded assignment of all registered copyrights covering stylebooks prepared, published, and distributed by Graphic Fashions, Inc., and

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all of the copyrighted images and visual representations displayed in those stylebooks.

43. Plaintiff is the sole owner of the registered copyrights covering the preexisting materials, the 1999-00 Stylebook, the 2005 Stylebook, the 2006 Stylebook, and all of the copyrighted images and visual representations displayed in those stylebooks.

44. Plaintiff is the sole owner of the copyright protections in the preexisting material utilized in the 1999-00 Stylebook, the 2005 Stylebook and 2006 Stylebook.

45. Defendants' copying of images showing drawings of men's and women's fashion clothing styles from Plaintiffs' copyrighted stylebooks, and their display on a website to advertise their traveling schedules for custom suit fittings, infringed each of the compilation copyrights that protect one or more of the 18 images.⁵

⁵ These 30 prior stylebooks were named and registered as follows: Designed for Winter 1961, Registration No. A451646; Fashions International Fall & Winter 1973-1974, Registration No. 440204; Fashions International 1974 Spring & Summer, Registration No. A488-310; Fashions International 1975 Spring & Summer, Registration No. A591921; Fashions International Spring & Summer 1976, Registration No. A722732; Fashions International Fall-Winter 1977-1978, Registration No. A900783; Fashions International Fall-Winter 1978-1979, Registration No. TX0000054929; Fashions International Fall-Winter 1980-1981, Registration No. TX0000539997; Fashions International Fall-Winter 1981-1982, Registration No. TX0000731329; Fashions International Spring-Summer 1982, Registration No. TX0000821050; Fashions International Fall-Winter 1982-1983, Registration No. TX0001067384; Fashions International Spring-Summer 1984, Registration No. TX0001269970; Fashions International Fall-Winter 1984-1985,

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46. Defendant acted with willful blindness to and in reckless disregard of Plaintiff's registered copyrights, including the several copyright notices accompanying the images, and the copyright notices displayed at the beginning of the stylebooks.

47. Defendants unabashed theft of Plaintiff's copyrighted images; their purposeful display, transmission, and distribution of the copyrighted images on, <www.vinnieshk.com>, further show the willfulness of Defendants' copyright infringement.

Registration No. TX0001378891; Fashions International Spring-Summer 1985, Registration No. TX0001501023; Fashions International Fall-Winter 1985-1986 Registration No. TX0001662171; Fashions International Spring-Summer 1986, Registration No. TX0001714805; Fashions International Fall-Winter 1986-1987, Registration No. TX0001838271; Fashions International Fall-Winter 1987-1988, Registration No. TX0002150566; Fashions International Spring-Summer 1988, Registration No. TX0002240703; Fashions International Fall and Winter 1988-1989, Registration No. TX2353266; Fashions International Spring and Summer 1989, Registration No. TX2509479; Fashions International Autumn-Winter 1989-1990, Registration No. TX0002611019; Fashions International Fall-Winter 1990-1991, Registration No. TX0002902726; Fashions International Spring-Summer 1991, Registration No. TX0003053310; Fashions International Spring-Summer 1992, Registration No. TX0003229071; Fashions International Spring-Summer 1993, Registration No. TX0003446818; Fashions International Fall-Winter 1997-1998, Registration No. TX0004621545; Distinctive Fashions 1998 Registration No. TX0005253538; Fashions International Fall-Winter 1998-1999, Registration No. TX0004831173; and Fashions International Styles for Seasons 1999-2000, Registration No. TX0005037124; Registration No. TX0005037124; Graphic Styles International Stylebook, Best of Seasons through Spring and Summer 2005 Registration No. TX 6-956-665; Graphic Styles International Stylebook, Best of Seasons 2006 Registration No. TX 6-956-762.

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Attorney at Law

48. As a result of their wrongful conduct, Defendant is liable to Plaintiff for copyright infringement under 17 U.S.C. § 501.

49. Plaintiff is entitled to recover, under 17 U.S.C. § 504(b), actual damages for its established fees for individual illustrations of up to One Thousand, Eight Hundred and Fifty Dollars (\$1,850.00) and yearly renewal fees of up to Six Hundred Dollars (\$600.00) for copying and website publishing, and any of Defendants' profits that are attributable to Defendants' infringement.

50. In the alternative, Plaintiff claims statutory damages under 17 U.S.C. §504(c) for Defendants' unauthorized use and copyright infringement of up to 76 of Plaintiff's registered copyrighted works.

51. Defendants' infringement has been willful within the meaning of the Copyright Act, so the Court's award of actual or statutory damages should be enhanced in accordance with 17 U.S.C. § 504(c)(2).

52. Plaintiff is also entitled to recover its attorney fees and expenses incurred in suit, including its costs of investigation under 17 U.S.C. §505 and other equitable doctrines.

RELIEF REQUESTED

WHEREFORE, Plaintiff requests judgment against Defendant as follows:

A. That the Court enter a judgment against Defendant that:

i. Defendant have willfully infringed Plaintiff's federally registered copyrights under 17 U.S.C. § 501.

ii. Defendant have otherwise injured the business reputation and business of Plaintiff by their acts and conduct set forth in this Complaint.

B. Defendant shall pay Plaintiff's general, special, actual, and statutory damages, and disgorge profits attributable to Defendants' infringement, under 17 U.S.C. § 504(b), or in the alternative, enhanced statutory damages under 17 U.S.C. § 504(c)(2), for Defendants' willful infringement of Plaintiff's copyrights.

C. Defendant shall pay Plaintiff for his costs incurred in prosecuting this action, Plaintiffs costs of investigating Defendants' willful infringement, and his reasonable attorney fees.

D. Defendant shall cease and desist immediately from all use, copying, reproducing, displaying or transmitting

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in any form, including electronically, any and all of Plaintiff's copyrighted works, drawings, and images.

E. Plaintiff claims damages for the infringement of the 1999-00 Stylebook, the 2005 Stylebook as a compilation, the 2006 stylebook as a compilation and independently for the copyright protections in the preexisting material.

F. The Court shall grant Plaintiff such other and additional relief as is just and proper.

JURY DEMAND

PLAINTIFF hereby demands trial by jury on all issues triable to a jury.

DATED: June 7, 2017

LAW OFFICES

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Attorney at Law

3724 East Brandon Way

Doylestown, Pennsylvania 18902

(215) 230-3761

By: _____

Michael J. Brooks, Esquire

Attorney for Plaintiff

PA Supreme Court I.D. No. 74630

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MICHAEL J. BROOKS, ESQUIRE

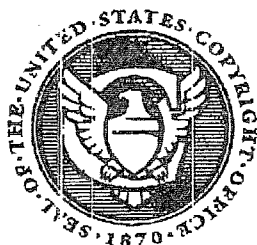
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Certificate of Recordation

This is to certify that the attached document was recorded
in the Copyright Office on the date and in the place shown below.

This certificate is issued under the seal of the
United States Copyright Office.

DATE OF RECORDATION

8Jul10

VOLUME

DOC. NO.

3587

238

VOLUME

DOC. NO.

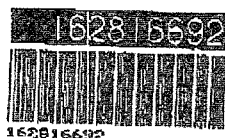
Marybeth Peters

Register of Copyrights and
Associate Librarian for Copyright Services

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DOCUMENTS SECTION

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Co:
Fo:
WA:
OT:

Document Cover Sheet

UNITED STATES COPYRIGHT OFFICE

For Recordation of Documents

Volume 3587 Document 238

Volume _____ Document _____

Date of recordation JUL 08 2010
(ASSIGNED BY THE COPYRIGHT OFFICE)

Funds received _____

DO NOT WRITE ABOVE THIS LINE - SEE INSTRUCTIONS ON REVERSE

To the Register of Copyrights: Please record the accompanying original document or properly certified copy thereof.

1 First party name given in the document Graphic Fashions, Inc.2 First title given in the document Fashions International, fall and winter, 1990-19913 Total number of titles in the document 244 Amount of fee calculated \$ 675.005 Fee enclosed ☒ Check ☐ Money order
☐ Fee authorized to be charged to Copyright Office deposit account

Deposit account number _____

Deposit account name _____

6 Completeness of document ☒ Document is complete by its own terms ☐ Document is not complete. Record "as is."

IMPORTANT NOTE: A request to record a document "as is" under 37 CFR §201.4(c)(2) is an assertion that: (a) the attachment is completely unavailable for recordation; (b) the attachment is not essential to the identification of the subject matter of the document; and (c) it would be impossible or wholly impracticable to have the parties to the document sign or initial a deletion of the reference to the attachment.

7 Certification of Photocopied Document Complete this certification if a photocopy of the original signed document is substituted for a document bearing the actual original signature.
NOTE: This space may not be used for documents that require an official certification.

I declare under penalty of perjury that the accompanying document is a true and correct copy of the original document.

Signature Richard D. Ackoway, Jr. Date 7/2/2010

Fully authorized agent of _____

8 Return to: Name Richard D. Ackoway, Jr.Number/street 19 Cypress Circle Apt./suite _____City Ricktown State PA Zip 18954Phone number 215-808-8488 Fax number 215-364-4710Email Rick@thestylebook.com

SEND TO: Library of Congress, Copyright Office, Documents Recordation Section, 101 Independence Avenue SE, Washington, DC 20559-6000

INCLUDE ALL THESE TOGETHER: (1) Two copies of this form; (2) payment from a deposit account or by check/money order payable to Register of Copyrights; and (3) your document.

COPYRIGHT ASSIGNMENT

AGREEMENT made by and between [Graphic Fashions, Inc. and Virginia Garner, wife of the late John Garner], having an address of 615 Laurel Lake Drive A219, Columbus, NC 28722 (hereinafter called "Assignor") and Richard C. Ackourey, Jr., having a principal place of business at 2423 Susquehanna Road, Suites 3 & 4, Roslyn, PA 19001 (hereinafter called "Assignee").

WHEREAS, the late John Garner had prepared, created, or developed certain materials or works, (some of which are covered by the copyright Registrations, shown in Exhibit A hereto) which were exclusively licensed by him and his company, Graphic Fashions, Inc. to Assignee by letter dated January 5, 2003, attached as Exhibit B (hereinafter the "Work");

WHEREAS, Assignor desires to transfer the entire ownership of all intellectual property, including but not limited to the copyright in the Work, to Assignee;

IT IS THEREFORE agreed between Assignor and Assignee as follows:

1. Assignor hereby grants, transfers, assigns, and conveys to Assignee, its successors and assigns, the entire title, right, interest, ownership and all subsidiary and intellectual property rights in and to the Work, including but not limited to copyrights and the right to secure copyright registrations therein and to any resulting registrations in Assignee's name as claimant, and the right to secure renewals, and extensions of any such copyright or copyright registrations in the United States of America or foreign country as well as all choses in action relating to said Work, claims for damages, profits and costs, both in equity and law, for any infringement of said Work.

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Page 1

2. Whether the copyright in the Work shall be preserved and maintained or registered in the United States of America or any foreign country shall be the sole discretion of Assignee.

3. Assignor agrees that, as a result of this Copyright Assignment, it will retain no rights in and to the intellectual property in the Work, including: trademark and trade dress protection and copyright in the Work; the right to reproduce, prepare derivative works based upon the copyright in the Work, or to distribute by sale, by rental, lease or by other transfer of ownership; or to display the Work.

4. Assignor hereby warrants and represents the following to Assignee:

(a) To the best of Assignor's knowledge and belief, Assignor is the exclusive and sole owner of the copyright in the Work, free of all liens, claims and encumbrances; and Assignor has the absolute right to assign the copyright in the Work without seeking the approval of any third party and without payment to any third party. There are no actions at law or in equity pending or threatened by or against Assignor by reason of its or another party's use of the Work or challenging Assignor's copyright in the Work.

(b) To the best of Assignor's knowledge and belief, the Work is original with Assignor.

(c) To the best of assignor's knowledge and belief, Assignor is not restricted or prevented from entering into this Copyright Assignment

5. Assignor agrees to take all action and cooperate as is necessary to protect the copyrightability of the Work and further agrees to execute any documents

that might be necessary to perfect Assignee's ownership of copyright and other intellectual property including any copyright registrations in the Work.

6. All terms of this Agreement are applicable to any portion or part of the Work, as well as the Work in its entirety.

7. This Agreement constitutes the entire agreement between the parties hereto and supersedes any prior oral or written agreement or understanding between the parties as to ownership of intellectual property rights, including trademark and trade press protection and copyright in the Work, and no modification shall be valid unless signed by both parties.

8. This Agreement shall be interpreted under the laws of the state of Pennsylvania.

IN WITNESS WHEREOF and intending to be legally bound hereby, the parties have hereunder set their hands.

Executed: 7-3-07

X Virginia H. Garner
By: [Assignor name]

Ruth P. Heinemann
WITNESS

Executed: 11/16/05

Richard C. Ackourey, Jr.
By: [Assignee name]

Name: Richard C. Ackourey, Jr.

Title: President

Wanda Ackourey
WITNESS

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TX 1-269-970 20Dec83; spring-summer 84. DCR 1983; PUB 30Nov83;

Title: Fashions international
 Additional Information: .
 Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.
 Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.
 Claimant: * acGraphic Fashions, Inc.
 TX 1-378-891 14Jun84; fall 84-winter 85. DCR 1984; PUB 30May84;

Title: Fashions International
 Additional Information: .
 Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.
 Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.
 Claimant: * acGraphic Fashions, Inc.
 TX 1-501-023 22Jan85; spring-summer 85. DCR 1985; PUB 15Jan85;

Title: Fashions International
 Additional Information: .
 Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.
 Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.
 Claimant: * acGraphic Fashions, Inc.
 TX 1-662-171 25Sep85; fall 85-winter 86. DCR 1985; PUB 15Jun85;

Title: Fashions International
 Additional Information: .
 Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.
 Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.
 Claimant: * acGraphic Fashions, Inc.
 TX 1-734-805 13Dec85; spring-summer 86. DCR 1985; PUB 1Dec85;

Title: Fashions international
 Additional Information: .
 Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.
 Claimant: * acGraphic Fashions, Inc.
 TX 1-838-271 11Jun86; fall 86-winter 87. DCR 1986; PUB 1Jun86;

Title: Fashions international
 Additional Information: .
 Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.
 Claimant: * acGraphic Fashions, Inc.
 TX 2-150-566 24Jul87; fall 87-winter 88. (C.O. corres.) DCR 1987; PUB 16Jun87;

Title: Fashions international
 Additional Information: .
 Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

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Copyright Search Records Results

Registered Works Database (Claimant Search)

Search For: GRAPHIC FASHIONS, INC.

Items: 1 - 4 of 4

For a list of commonly used abbreviations that appear in the catalog record, click here.

[Conduct Another Search](#)

1. Registration Number: TX-2-902-726

Title: Fashion international, fall and winter, 1990-1991.

Claimant: acGraphic Fashions, Inc.

Created: 1990

Published: 1Jun90

Registered: 15Aug90

Special Codes: 1/B

2. Registration Number: TX-3-229-071

Title: Fashions International : spring and summer 1992.

Claimant: acGraphic Fashions, Inc.

Created: 1991

Published: 2Jan92

Registered: 9Jan92

Special Codes: 1/B

3. Registration Number: TX-5-037-124

Title: Fashions international : styles for seasons 1999 and 2000.

Description: 1 v.

Claimant: acGraphic Fashions, Inc.

Created: 1999

Published: 15May99

Registered: 7Sep99

Title on © Application: Fashions international: seasons 1999-2000.

Special Codes: 1/B

4. Registration Number: TX-5-253-538

Title: Distinctive fashions 1998.

Description: 26 p.

Claimant: on text & artwork; acGraphic Fashions, Inc.

Created: 1997

Published: 15Aug97

Registered: 24Jul00

Title on © Application: Distinctive fashions.

Special Codes: 1/B/D

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Copyright Search Records Results

Serials Database (Claimant Search)

Search For: GRAPHIC FASHIONS, INC

Items 1 - 19 of 19

For a list of commonly used abbreviations that appear in the catalog record, click here.

[Conduct Another Search](#)

<p>Title: Fashions International</p> <p>Additional Information: : [fash on folio].</p> <p>Note: Frequency unknown. Description based on: Fall-winter 1978-79.</p> <p>Copyright Information: Appl. au.: acGraphic Fashions, Inc., employer for hire.</p> <p>Claimant: * Graphic Fashions, Inc. TX54-929. 14Jun78; fall-winter 78-79. DCR 1978; PUB 8Jun78;</p>
<p>Title: Fashions International</p> <p>Additional Information: .</p> <p>Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.</p> <p>Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.</p> <p>Claimant: * acGraphic Fashions, Inc. TX 539-997 14Jul80; fall 80-winter 81. (C.O. corres.) DCR 1980; PUB 1May80;</p>
<p>Title: Fashions International</p> <p>Additional Information: .</p> <p>Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.</p> <p>Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.</p> <p>Claimant: * acGraphic Fashions, Inc. TX 731-329 30Jul81; fall 81-winter 82. DCR 1981; PUB 1May81; TX 821-050 16Dec81; spring-summer 82. DCR 1981; PUB 5Nov81;</p>
<p>Title: Fashions International</p> <p>Additional Information: .</p> <p>Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.</p> <p>Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.</p> <p>Claimant: * acGraphic Fashions, Inc. TX 1-067-384 14Jan83; fall-winter 82-83. (C. O. corres.) DCR 1982; PUB 1Jun82;</p>
<p>Title: Fashions International</p> <p>Additional Information: .</p> <p>Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.</p> <p>Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.</p> <p>Claimant: * acGraphic Fashions, Inc.</p>

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Claimant: * acGraphic Fashions, Inc.

TX 2-240-703 19Jan88; spring-summer 88. DCR 1988; PUB 2Jan88;

Title: Fashions International

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: * acGraphic Fashions, Inc.

TX 2-353-266 13Jul88; fall 88-winter 89. DCR 1988; PUB 1Jul88;

Title: Fashions International

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: * acGraphic Fashions, Inc.

TX 2-509-479 13Feb89; spring-summer 89. DCR 1989; PUB 2Jan89;

Title: Fashions International

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: * acGraphic Fashions, Inc.

TX 2-611-019 30Jun89; fall 89-winter 90. DCR 1989; PUB 1Jun89;

Title: Fashions International

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: * acGraphic Fashions, Inc.

TX 3-053-310 12Mar91; spring-summer 91. DCR 1991; PUB 1Jan91;

Title: Fashions International

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: * acGraphic Fashions, Inc.

TX 3-446-818 9Dec92; spring-summer 93. DCR 1992; PUB 6Dec92;

Title: Fashions International

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: * acGraphic Fashions, Inc.

TX 4-621-545 25Aug97; fall 97-winter 98. DCR 1997; PUB 15Apr97;

Title: Fashions International

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: * acGraphic Fashions, Inc.

TX 4-831-173 17Sep98; fall 98-winter 99. DCR 1998; PUB 15Jun98;

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GRAPHIC FASHIONS, INC.

P.O. BOX 383 • JENKINTOWN, PA 19046-0383

Mr. Richard C. Ackourey, Jr.
Ackourey Clothiers, Inc.
2423 Susquehanna Road, Suite #4
Roslyn, PA 19001

RE: Permission to Use Copyrighted Works of John Garner and/or Graphic Fashions, Inc.

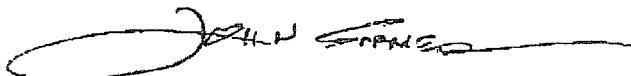
Dear Rick:

On behalf of myself and of Graphic Fashions, Inc., I, John Garner, grant you, Richard C. Ackourey, Jr., exclusive permission to do the following with respect to all of the copyrighted works owned by me and/or by Graphic Fashions, Inc. to which you have access (hereinafter "Copyrighted Works"):

1. Reproduce the Copyrighted Works;
2. Prepare derivative works (hereinafter "Derivative Works") based upon the Copyrighted Works [1];
3. Distribute copies of the Copyrighted Works or Derivative Works to the public by sale or other transfer of ownership, or by rental, lease or lending;
4. Display the Copyrighted Works or Derivative Works publicly; and
5. Transmit the Copyrighted Works or Derivative Works.

The permission referred to in this letter shall last for the life of the copyright in said Copyrighted Works.

Sincerely yours,


John Garner

Witness:

Date:

[1] I hereby assign to Richard C. Ackourey, Jr. all copyright rights in and to all Derivative Works created by Richard C. Ackourey, Jr. based upon the Copyrighted Works.

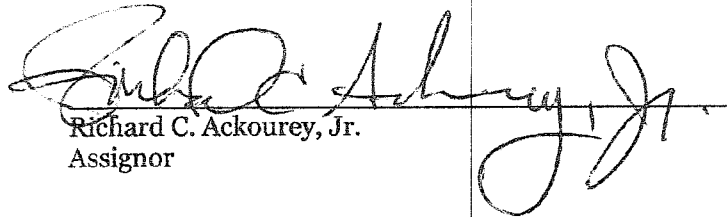
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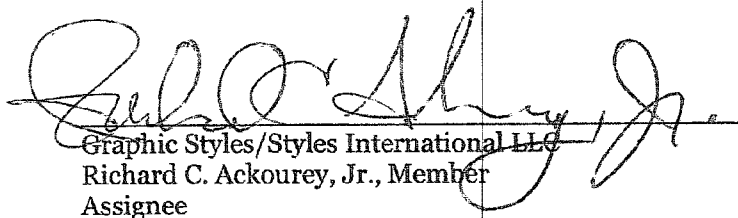
thereof, and in and to all works based upon, derived from, or incorporating the Works, and in and to all income, royalties, damages, claims and payments now or hereafter due or payable with respect thereto, and in and to all causes of action and accrued causes of action, either in law or in equity for past, present, or future infringement based on the copyrights, and in and to all rights corresponding to the foregoing throughout the world. ²

2. Assignor agrees to execute all papers and to perform such other proper acts as Assignee may deem necessary to secure for Assignee or its designee the rights herein assigned.

In witness whereof, the parties have executed this Agreement, effective this 4th day of June,

2014 .


Richard C. Ackourey, Jr.
Assignor


Graphic Styles/Styles International LLC
Richard C. Ackourey, Jr., Member
Assignee

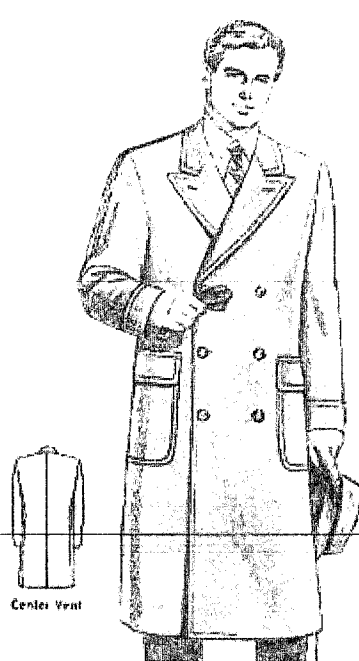
² This copyright assignment expressly assigns accrued causes of action in order for the assignee to have standing to challenge pre-assignment infringement, with the exception of the causes of action already filed by Richard C. Ackourey including the filing and/or refiling of *Ackourey v. World of Elegance, Inc., et al*, E.D. of PA. Civil Action No. 2:13-cv-0234; *Ackourey v. Ross Creations Inc., et al.*, E.D. of PA. Civil Action No. 2:12-cv-06728; and *Ackourey v. Andre Lani Custom Clothers, et al.*, E.D. of PA. Civil Action No. 2:12-cv-1686 .



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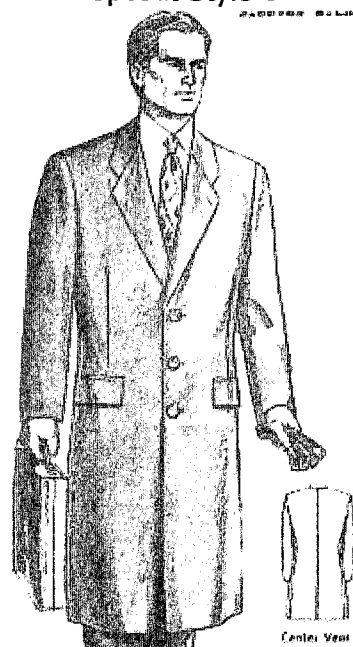
We can also copy styles from a sample or picture.



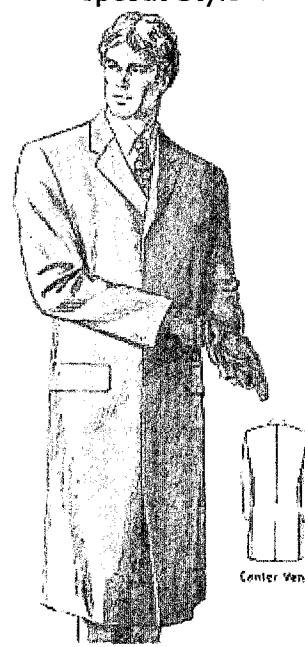
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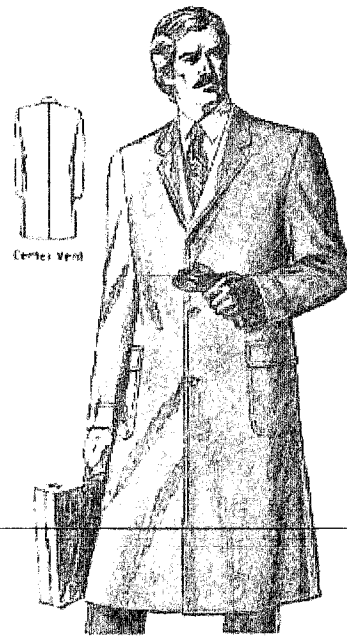
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Topcoat Style 3



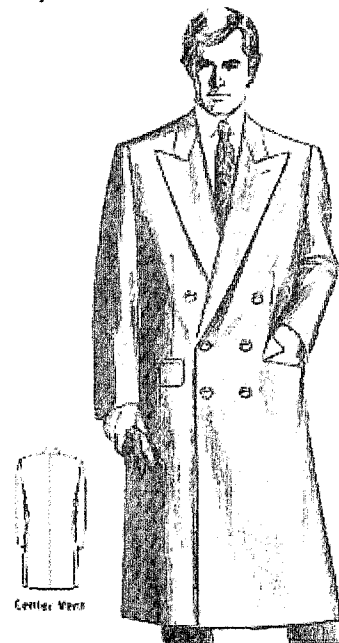
Topcoat Style 4



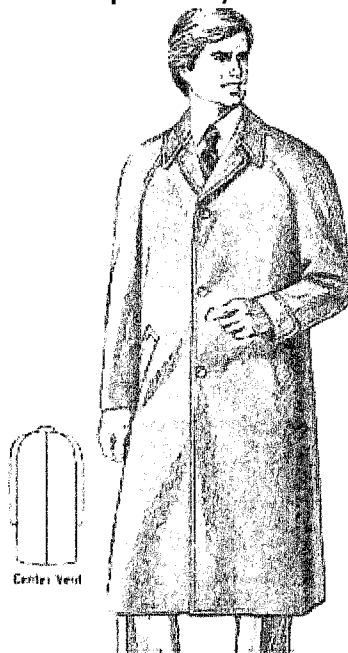
Topcoat Style 5



Topcoat Style 6














Topcoat Style 7



Topcoat Style 8



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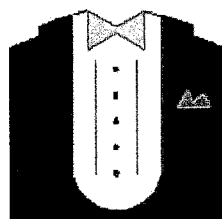
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Tuxedo



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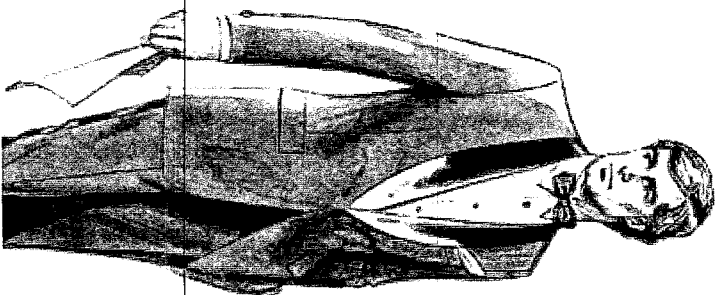
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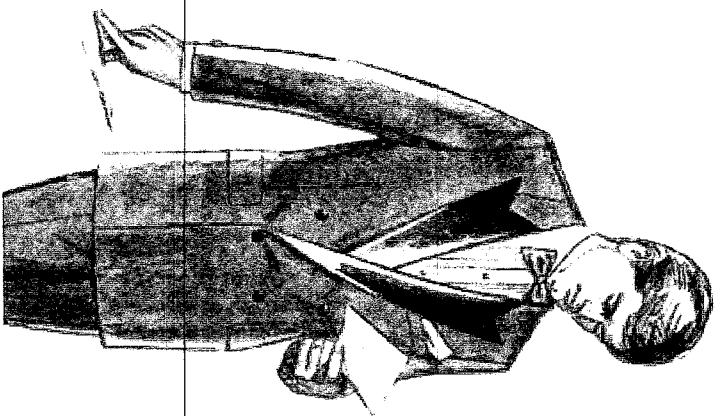
1 Button Notch Lapel



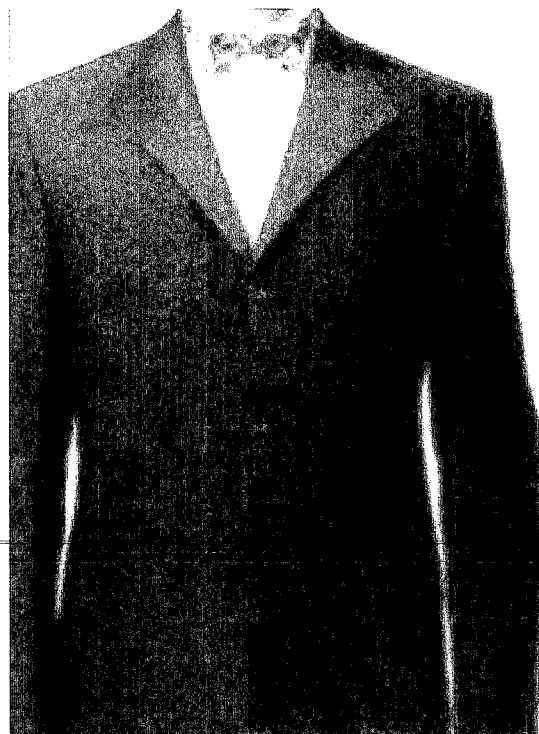
1 Button Peak Lapel



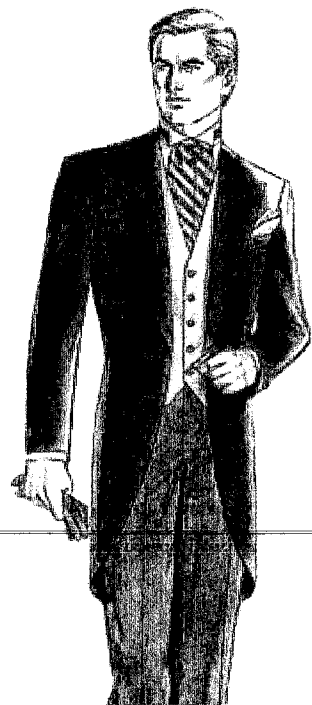
1 Button Shawl Collar



4-1 Double Breasted



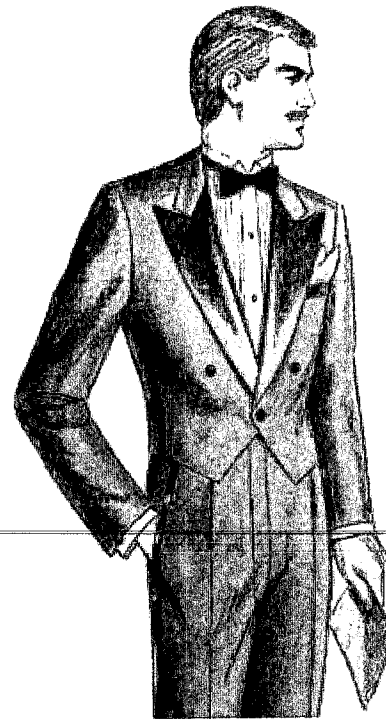
3 Button Delta Lapel



Classic Cutaway



Full Dress Tuxedo



Dinner Jacket



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WHEREAS, Assignor desires to transfer the entire right, title and interest in and to the copyrights in materials, and works contained in Stylebooks to Assignee;

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